

**REMARKS**

**Claim Objections**

Claim 4 was objected to as having improper numbering. Applicant has amended this claim to correctly include the proper numbering. That is, Applicant has amended claim 4 to make it depend on independent claim 1. This change corrects a formatting error, and, as such, is not related to the patentability of this or any other claim.

Claims 8, 11 and 14 were objected to under 37 C.F.R. §1.75(c) as being in improper dependent form. Applicant has amended claims 8, 11 and 14 as well as claims 6 and 12 to indicate that the "encapsulated header" is sometimes a --outer encapsulating header-- (claims 6 and 12) or an --inner encapsulating header-- (claims 8, 11 and 14).

Accordingly, Applicant respectfully submits that claims 6, 8, 11, 12 and 14 are in proper dependent form.

**The Section 112 Rejections**

Claims 8, 11 and 14 were rejected under 35 U.S.C. §112, second paragraph. In addition, claims 9-11 were rejected under 35 U.S.C. §112, second paragraph. Applicant respectfully submits that the revisions to claims 6, 8, 11, 12 and 14 above and the amendment of claim 9 (see revised claim 9) render the rejections under 35 U.S.C. §112, second paragraph, moot. Accordingly, Applicant respectfully requests withdrawal of the pending rejections and allowance of claims 8-11 and 14.

**The Section 103 Rejections**

Claims 1, 2 and 4-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Perkins (RFC 2002 <http://www.ietf.org/rfc/rfc2002.txt?number=2002>, October 1996) (herein referred to as "Perkins") in view of Harvey et al., U.S. Patent No. 6,189,039 ("Harvey").

Each of claims 1, 2 and 4-14 require the mapping, at a second interface of a home router, of unicast addresses of packets received at a second interface and destined for members of a subnet (U1), to group addresses (Mx) assigned to members of the subnet, among other things.

As the Office Action admits, Perkins does not disclose such mapping. To overcome this deficiency, the Examiner relies on Harvey. Applicant respectfully disagrees and traverses this rejection for at least the following reasons.

While Perkins arguably discloses techniques related to tracking a mobile device as it moves from one location to another, Harvey is wholly unrelated to such tracking. Instead, Harvey discloses techniques for streaming data without regard to whether or not the mobile device which sends or receives the streaming data can be tracked or not (i.e., can receive the data or not).

Accordingly, Applicant respectfully submits that one of ordinary skill in the art would not be motivated to combine Perkins and Harvey because they are directed at solutions to different problems.

In addition, Applicant respectfully submits that even if such a combination is proper, the combination does not disclose or suggest the mapping, at a second interface of a home router, of unicast addresses of

packets received at a second interface and destined to members of a subnet (U1), to group addresses (Mx) assigned to members of the subnet, as in claims 1, 2 and 4-14 of the present invention.

The Office Action has admitted that Perkins does not disclose or suggest such mapping; nor does Harvey.

The Office Action refers to column 6, line 58 through column 7, line 4 which states, in sum, that a packet is read from a "unicast socket" and then written to a "multicast socket." Applicant respectfully submits that these read and write functions do not equate to, and are not suggestive of, the mapping of unicast addresses to group addresses, as in claims 1, 2 and 4-14 of the present invention. There is no indication, or suggestion, in Harvey that the "multicast socket" is associated with a group address as is required by claims 1, 2 and 4-14 of the present invention.

Accordingly, Applicant respectfully submits that the subject matter of claims 1, 2 and 4-14 would not have been obvious to one of ordinary skill in the art upon reading the disclosures of Perkins and Harvey at the time the application was filed.

Accordingly, Applicant respectfully requests withdrawal of the pending rejections and allowance of claims 1, 2 and 4-14.

Claim 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Perkins in view of Harvey and in further view of Reid, U.S. Patent No. 6,131,120 ("Reid"). Applicant respectfully submits that, because claim 3

depends on claim 1, claim 3 is patentable over the combination of Perkins, Harvey and Reid for at least the reasons stated above with respect to claim 1.

Accordingly, Applicant respectfully requests withdrawal of the pending rejection and allowance of claim 3.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John E. Curtin at the telephone number of the undersigned below.

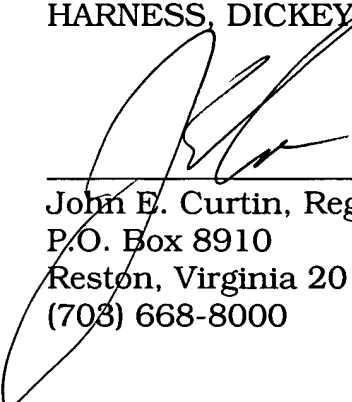
In the event this Response does not place the present application in condition for allowance, applicant requests the Examiner to contact the undersigned at (703) 668-8000 to schedule a personal interview.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By



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